

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

03-MDL-1570 (GBD)(SN)

**TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**IRAN NOTICE OF
AMENDMENT**

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This document relates to: *Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.*, No. 15-cv-9903 (GBD)(SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 53, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☐ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☒ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the new Plaintiff's date of death (if deceased), the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

No.	New Plaintiff's Name	Date of Death	Plaintiff's State of Residency at Filing	Plaintiff's Citizenship - Nationality on 9/11/01	Decedent's Name	New Plaintiff's Relationship to Decedent Paragraph of Complaint Discussing Decedent	Paragraph of Complaint Discussing Decedent
1	Maler, Alfred Royce		NJ	U.S.	Maler, Alfred Russell	Child	ECF#53 ¶ 1199
2	Mangano, Philip		NC	U.S.	Mangano, Joseph	Sibling	ECF#53 ¶ 1666
3	Mangano, Michael		PA	U.S.	Mangano, Joseph	Child	ECF#53 ¶ 1666
4	Marrero, Jonathan		NJ	U.S.	Marrero, Jose	Child	ECF#53 ¶ 1167
5	Matuza, Jesse A.		NY	U.S.	Matuza, Walter A.	Child	ECF#53 ¶ 1453
6	Matuza, Nico S.		NY	U.S.	Matuza, Walter A.	Child	ECF#53 ¶ 1453
7	Matuza, Walter Philip		NY	U.S.	Matuza, Walter A.	Child	ECF#53 ¶ 1453
8	McAvoy, Kate Marie		CA	U.S.	McAvoy, John K.	Child	ECF#53 ¶ 1827
9	McAvoy, Kevin James		NY	U.S.	McAvoy, John K.	Child	ECF#53 ¶ 1827
10	McIntyre, Jeannine Marie on behalf of minor child L.M.		NY	U.S.	McIntyre, Donald J.	Child	ECF#53 ¶ 2239
11	Middleton, Mary L. on behalf of minor child M.J.M.		CO	U.S.	Murphy, James Thomas	Child	ECF#53 ¶ 154

12	Murach, Hayley		CA	U.S.	Murach, Robert	Child	ECF#53 ¶ 2785
13	Murach, Madison		MA	U.S.	Murach, Robert	Child	ECF#53 ¶ 2785
14	Murphy Jr., James Thomas		CO	U.S.	Murphy, James Thomas	Child	ECF#53 ¶ 154
15	Murphy, Morgan Shay		CO	U.S.	Murphy, James Thomas	Child	ECF#53 ¶ 154
16	O'Keefe, Kaitlin		NY	U.S.	O'Keefe, William S.	Child	ECF#53 ¶ 2514
17	Reisman, Dillon Scott		NJ	U.S.	Reisman, Frank	Child	ECF#53 ¶ 2643
18	Reisman, Kasey Michelle		NJ	U.S.	Reisman, Frank	Child	ECF#53 ¶ 2643
19	Rivera, Jr., Isaías		NY	U.S.	Rivera, Isaías	Child	ECF#53 ¶ 145
20	Rivera, Lynnette		NJ	U.S.	Rivera, Isaías	Child	ECF#53 ¶ 145

Dated: November 1, 2019

Respectfully submitted,

/s/ John Eubanks

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